

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

TONYA E. BOSTIC, individually, and
on behalf of all others similarly
situated,

Plaintiff,

v.

MICHAEL ANDREWS &
ASSOCIATES, LLC,

Defendant.

Case No. 2:21-cv-10419-PDB-EAS

Honorable Paul D. Borman

**AGREED MOTION TO EXTEND TIME TO FILE RESPONSE TO
DEFENDANT’S MOTION TO DISMISS**

NOW COMES TONYA E. BOSTIC (“Plaintiff”), by and through her undersigned counsel, moving this Honorable Court to extend the time for Plaintiff to file her response to Defendant MICHAEL ANDREWS & ASSOCIATES, LLC’S (“Defendant”) Motion to Dismiss, and in support thereof, stating as follows:

1. On March 23, 2021, Plaintiff filed her first amended class action complaint against Defendant for violations of the Fair Debt Collection Practices Act (“FDCPA”). [Dkt. 8]

2. On April 27, 2021, after receiving an extension to file its responsive pleading, Defendant filed a Motion to Dismiss Plaintiff's claims in their entirety ("Defendant's Motion"). [Dkt. 11]

3. Pursuant to Local Rule 7.1(e)(2)(A), Plaintiff's response to Defendant's Motion is due on or before May 18, 2021.

4. Due to other professional deadlines, and despite the undersigned's best efforts, Plaintiff will not be able to submit her response to Defendant's Motion by the current deadline of May 18, 2021.

5. Accordingly, Plaintiff is seeking a 21-day extension, through June 8, 2021, to submit her response to Defendant's Motion.

6. Counsel for Plaintiff conferred with Defendant's counsel about the relief sought herein, and Defendant has no objection.

7. The extension of time is not meant for purposes of unnecessary delay and will not prejudice any party in the litigation.

WHEREFORE, Plaintiff respectfully requests that the Court enter an order (1) extending the deadline for Plaintiff to submit her response to Defendant's Motion through June 8, 2021, and (2) extending Defendant's deadline to submit its reply through June 22, 2021, and for any other relief this Court deems appropriate.

Respectfully submitted,

/s/ Mohammed O. Badwan

Mohammed O. Badwan

Counsel for Plaintiff

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CERTIFICATE OF SERVICE

I, Mohammed O. Badwan, certify that on May 18, 2021, the foregoing document was filed electronically using the Court's CM/ECF system, which will accomplish service on all counsel of record.

/s/ Mohammed O. Badwan